

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Investigation pursuant to Senate Bill 380 to determine the feasibility of minimizing or eliminating the use of the Aliso Canyon natural gas storage facility located in the County of Los Angeles while still maintaining energy and electric reliability for the region.

I.17-02-002

**SOUTHERN CALIFORNIA PUBLICLY OWNED UTILITIES
OPENING COMMENTS ON FINAL PROPOSAL**

Norman A. Pedersen, Esq.
HANNA AND MORTON LLP
444 South Flower Street, Suite 2530
Los Angeles, California 90071-2916
Telephone: (213) 430-2510
Facsimile: (213) 623-3379
E-mail: npedersen@hanmor.com

Attorneys for the **SOUTHERN
CALIFORNIA PUBLICLY OWNED
UTILITIES**

Dated: October 9, 2018

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In accordance with the Administrative Law Judge’s Ruling dated September 14, 2018, in the captioned proceeding,¹ the Southern California Publicly Owned Utilities (“SCPOU”) respectfully provide these opening comments on the California Public Utilities Commission (“Commission”) Energy Division’s Scenarios Framework I.17-02-002 (“Final Proposal”).

SCPOU provided informal comments on the Energy Division’s Initial Proposed Phase 1 Scenarios Framework issued on June 26, 2018, and participated in the subsequent workshop on August 1, 2018. SCPOU also provided informal comments on the Energy Division’s Updated Phase 1 Scenarios Framework issued on June 15, 2018, and participated in the workshop held on July 31, 2018.

The Final Proposal reflects substantial progress in refining the scenarios that will be modeled to determine the feasibility of minimizing or eliminating the use of the Aliso Canyon natural gas storage field (“Aliso Canyon”) while still maintaining energy and electric reliability for southern California. Additionally, there are new features in the Final Proposal. For example, the Energy Division now plans to utilize smart meter data to shape core gas demand.² The use of

¹ Administrative Law Judge’s Ruling Entering into Record Energy Division’s Final Phase 1 Scenarios Framework, Requesting Comment and Setting Procedure to Request Phase 1 Evidentiary Hearings (September 14, 2018).

² Final Proposal, p. 12.

aggregated data from the SoCalGas Advanced Metering Infrastructure system as now proposed by the Energy Division should enhance the hydraulic modeling of the SoCalGas transmission and distribution system.

SCPOU looks forward to further participation in this proceeding after the completion of the modeling process.

Respectfully submitted,

/s/ Norman A. Pedersen

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Los Angeles, California 90071-2916
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